

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION**

12-md-02311
Honorable Marianne O. Battani

In Re: All Auto Parts Cases

2:12-MD-02311-MOB-MKM

**THIS DOCUMENT RELATES TO:
ALL AUTO PARTS CASES**

Oral Argument Requested

**DEFENDANTS' NOTICE OF FILING UNDER SEAL PORTIONS OF THEIR REPLY
IN SUPPORT OF THE PARTIES' MOTION TO COMPEL DISCOVERY FROM NON-
PARTY ORIGINAL EQUIPMENT MANUFACTURERS
AND CERTAIN EXHIBITS THERETO**

The defendants have filed a Reply in Support of the Parties Motion to Compel Discovery from Non-Party Original Equipment Manufacturers. The defendants' reply relies in part on an expert declaration that contains information received in discovery from Auto Dealer Plaintiffs that has been designated as highly confidential, as well as excerpts of deposition testimony that has been designated as highly confidential. Pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (the "Protective Order"), 12-md-2311, Dkt. 200, the Defendants hereby provide notice that the following exhibits are being filed under seal (the "Sealed Exhibits"):

- Exhibit 1: Declaration of Dr. Edward A. Snyder.
- Exhibit 3: Relevant Excerpts of Transcript of Deposition of Non-Party Auto Dealer Granite Imports.
- Exhibit 4: Relevant Excerpts of Transcript of Deposition of Non-Party Auto Dealer Bird Chevy.

Paragraph 19 of the Protective Order provides that “this Order shall serve as a stipulated order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal according to the procedures contained in the Protective Order. *See* Protective Order ¶7. No means other than sealing will preserve the confidentiality of this highly confidential information.

Dated: March 11, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 11, 2016. Any other counsel of record will be served by first class mail.

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